

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

STEVEN FRIDLEY,

Plaintiff,

vs.

THE CITY OF CLEVELAND, et al.,

Defendants.

CASE NO. 1:18-CV-02431-SO

JUDGE SOLOMON OLIVER, JR.

**JOINT NOTICE OF SETTLEMENT  
AND MOTION FOR STAY OF  
DEADLINES**

The parties hereby provide notice that a tentative settlement resolving all claims in Plaintiff's First Amended Complaint has been reached in this matter. Therefore, the parties request the Court stay all deadlines, including Defendants' deadline to file their Answer, for thirty (30) days in order to provide time to finalize the settlement and to file a Stipulation of Dismissal with Prejudice. This request is made for good cause and not for purposes of delay.

Respectfully submitted,

*/s/ Patrick Kabat*

Subodh Chandra (OH Bar No. 0069233)

[Subodh.Chandra@chandralaw.com](mailto:Subodh.Chandra@chandralaw.com)

Patrick S. Kabat (NY Bar No. 5280730)

[patrick.kabat@chandralaw.com](mailto:patrick.kabat@chandralaw.com)

Chandra Law Firm

1265 West Sixth Street

Cleveland, OH 44113

Telephone: 216.578.1700

Fax: 216.578.1800

*Attorneys for Plaintiff, Steven Fridley*

*/s/ Stephen W. Funk*

Stephen W. Funk (0058506)

[sfunk@ralaw.com](mailto:sfunk@ralaw.com)

John W. Breig, Jr. (0096767)

[jbreig@ralaw.com](mailto:jbreig@ralaw.com)

Roetzel & Andress, LPA

222 South Main Street, Suite 400

Akron, Ohio 44308

Telephone: 330.376.2700

Facsimile: 330.376.4577

*Attorneys for Defendants, The City of  
Cleveland and Calvin Williams*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 8th day of March, 2019, a true and accurate copy of the foregoing has been served upon the following parties via the Court's electronic filing system:

Subodh Chandra, Esq.  
Patrick S. Kabat, Esq.  
Chandra Law Firm  
1265 West Sixth Street  
Cleveland, OH 44113  
[Subodh.Chandra@chandraLaw.com](mailto:Subodh.Chandra@chandraLaw.com)  
[patrick.kabat@chandraLaw.com](mailto:patrick.kabat@chandraLaw.com)

*Attorneys for Plaintiff*

/s/ Stephen W. Funk

Stephen W. Funk (0058506)